



5209 EAST MARGINAL WAY S. • SEATTLE, WA 98134 • (206) 762-0850  
MAILING ADDRESS: P. O. BOX 24067 • SEATTLE, WA 98124-0067  
WA CONTRACTOR'S LICENSE #MANSOCC032M1 • FAX (206) 764-8595

LWSF  
12.3.148.1  
10/2/2011

Re: Response to Supplemental Request for Information Pursuant to Section 104(e) of CERCLA, for the  
Lower Duwamish Waterway Superfund Site, Seattle, Washington

Site: 5209 East Marginal Way S, Seattle, WA 98134  
5225 East Marginal Way S, Seattle, WA 98134

King County Parcels: 1924049041 and 1924049067

## Exhibit D

USEPA SF



1376784

Memorandum –

21 October 2011

From: John Stilwell

To: John Heckel

Subject: Results of Investigation Regarding PCB Oil-Filled Transformers at Manson Seattle Yard

John,

I conducted a survey of the Lofgren Distribution system and other rigs currently at Manson Seattle Yard.

The only rig with oil-filled transformers is the Lofgren.

To my best knowledge, it is the only rig on the West Coast that has oil filled transformers. I believe it is likely the only rig in Manson possession with oil-filled transformers that I am aware of.

I reviewed the EPA pcb inspection guidelines (link below)

<http://epa.gov/oecaerth/resources/publications/monitoring/tsca/manuals/pcbinspect/pcbinspect4.pdf>

Per the guidelines we have 4 transformers that definitely have or had PCB containing fluids in them.

Transformers 1 through 4 (shown below) are filled with PCB fluid.







Particulars on the single phase transformers:

Number	High Voltage	Low Voltage	KVA	Oil Capacity	Manufacturer	Date
1	2400VAC	120VAC	150	110 Gallons	Allis Chalmers	1964
2	2400VAC	480VAC	150	74 Gallons	G.E.	1964
3	2400VAC	480VAC	150	74 Gallons	G.E.	1964
4	2400VAC	480VAC	150	74 Gallons	G.E.	1965

Repectfully,

John  
Stilwell

Digitally signed by John Stilwell  
DN: cn=John Stilwell, o=Manson  
Construction, ou=Electrical  
Department,  
email=jstilwell@mansonconstru  
ction.com, c=US  
Date: 2011.10.21 15:00:07 -0700

John Stilwell

## OIL FILLED TRANSFORMER INFO.

### BARGE TRANSFORMERS

NUMBER	MAKE	SERIAL #	KVA	GALLONS	PPM/PCB	DATE	DATE DESTROYED
1	Moloney	703892	1000	507	<1	08/10/00	10/27/00
2	Moloney	703893	1000	507	<1	08/10/00	10/27/00
3	Moloney	703894	1000	507	<1	08/10/00	10/27/00
4	Gregory	5026575	100	47	4.57	08/10/00	10/27/00
5	Gregory	(No Tag)	100	47	<1	08/10/00	10/27/00
6	Allis Chalmers	2305997	100	63	5.26	08/10/00	10/27/00
7	Westinghouse	229376	N/A	N/A	<1	08/10/00	10/27/00
8	Westinghouse	109527B	N/A	N/A	<1	08/10/00	10/27/00
9	Oil Filled Circuit Breaker (Pacific Electric)	4222	N/A	70	<1	08/10/00	10/27/00
10 (WEST)	No Name Transformer	76A220010	N/A	N/A	<1	08/10/00	10/27/00
11	Moloney	703891	1000	507	<1	07/01/00	09/01/00
12	Moloney	703889	1000	507	<1	07/01/00	09/01/00
13	Moloney	703890	1000	507	<1	07/01/00	09/01/00
14	General Electric	2297058	1667	1100	6.2	07/01/00	09/01/00
15	General Electric	2297057	1667	1100	7.7	07/01/00	09/01/00
16	General Electric	4680071	1667	880	1.6	07/01/00	09/01/00
17	Westinghouse	76A431368	25	N/A	<1	10/24/00	12/01/00
18	General Electric (Oil Filled Circuit Breaker)	(can't read) GEH1772	N/A	N/A	<1	10/24/00	12/01/00

10/23/2000

#'s 1 - 10 trucked out w/Nelson Trucking for Coleman Calbag-recvd 1-10-01

#'s 17 & 18 waiting for PCB Report from Laucks Lab - Ann Ho-recvd-and recvd destroy date-1-10-01

See 2nd page





## OIL FILLED TRANSFORMER INFO.

### BARGE TRANSFORMERS

NUMBER	MAKE	SERIAL #	KVA	GALLONS	PPM/PCB	DATE	DATE DESTROYED
1	General Electric	8922679✓	0.5	6.5	<2	09/14/01	SENT TO COLMAN 12/27
2	General Electric	9063623✓	0.5	6.5	<2	09/14/01	
3	General Electric	9029520	Ratio 40/1	6.5	<2	09/14/01	
4	General Electric	9486795	Ratio 40/1	6.5	<2	09/14/01	



## Testing Laboratories, Inc.

940 South Harney St., Seattle, WA 98108 (206) 767-5060 FAX (206) 767-5063

Chemistry, Microbiology, and Technical Services

CLIENT: Manson Construction  
PO Box 24067  
Seattle, WA 98124

ATTN : Shawn Hillis

Work ID : Transformers  
Taken By : Client  
Transported by: Client  
Type : Oil

### Certificate of Analysis

Work Order# : 00-07-451

DATE RECEIVED : 07/21/00

DATE OF REPORT: 08/10/00

#### SAMPLE IDENTIFICATION:

	<u>Sample Description</u>		<u>Sample Description</u>
01	Moloney 703892	06	Allis Chalmers 2305997
02	Moloney 703893	07	Westinghouse 229376
03	Moloney 703894	08	Westinghouse 109527B
04	Gregory 5026575	09	Pacific Electric 4222
05	Gregory (No Tag)	10	No Name Transformer N/A

#### FLAGGING:

The flag "U" indicates that the analyte of interest was not detected to the limit of detection indicated.

#### ATTACHMENTS:

Following presentation of sample results, the following appendices are attached to this report:

- Appendix A: Method Blank Report
- Appendix B: Blank Spike Recovery Report
- Appendix C: Chain-of-Custody



This report is submitted for the exclusive use of the person, partnership, or corporation to whom it is addressed. Subsequent use of the name of this company or any member of its staff in connection with the advertising or sale of any product or process will be granted only on contract. This company accepts no responsibility except for the due performance of inspection and/or analysis in good faith and according to the rules of the trade and of science.





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Chemistry, Microbiology, and Technical Services

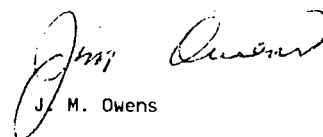
CLIENT : Manson Construction

### Certificate of Analysis

Work Order# : 00-07-451

Unless otherwise instructed all samples will be discarded on 09/18/00  
with the exception of samples which are consumed during the  
analysis, such as microbiological samples.

Respectfully submitted,  
Laucks Testing Laboratories, Inc.



J. M. Owens



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Chemistry, Microbiology, and Technical Services

CLIENT : Manson Construction

### Certificate of Analysis

Work Order # 00-07-451

#### TESTS PERFORMED AND RESULTS:

Analyte	Units	<u>01</u>	<u>02</u>	<u>03</u>	<u>04</u>
PCBs	mg/kg	1.0 U	1.0 U	1.0 U	4.57
Analyte	Units	<u>05</u>	<u>06</u>	<u>07</u>	<u>08</u>
PCBs	mg/kg	1.0 U	5.26	1.0 U	1.0 U
Analyte	Units	<u>09</u>	<u>10</u>		
PCBs	mg/kg	1.0 U	1.0 U		



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## Appendix A

### Method Blank Report



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### Quality Control Report Method Blanks for Work Order 0007451

Blank Name	Samples Verified	Test Description	Result	Units	Control
					Limit
B072500_GPX_M01	1-10	Total PCBs in Material	2.0 U	mg/kg AR	4.0

A method blank can validate more than one analyte on more than one work order. The method blanks in this report may validate analytes not determined on this work order, but nonetheless determined in the associated blank.

Because they validate more than one work order, method blank results are not always reported in the same concentration units or to the same detection limits that are used for sample results.

\* = blank exceeds control limit



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## Appendix B

### Blank Spike Recovery Report



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Chemistry, Microbiology, and Technical Services

### Quality Control Report Blank Spike Report for Work Order 0007451

Blank Spike Names		Fractions Verified	Analyte Name	Recov	LCL	UCL
Database	Lab Assigned					
S072500_GPXM01	S072500GPXOL	1-10	Aroclor 1242	87	20	160
S072500_GPXS01	S072500GPXOL	1-10	Aroclor 1242	87	20	160

\* = Value Exceeds Control Limit

LCL = Lower Control Limit

UCL = Upper Control Limit

A blank spike can validate the results for more than one work order. For this reason, results for analytes not requested on this work order may appear in this blank spike report.



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## Appendix C

### Chain-of-Custody



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## Testing Laboratories, Inc.

940 South Harney St., Seattle, WA 98108 (206) 767-5060 FAX (206) 767-5063

Chemistry, Microbiology, and Technical Services

CLIENT: Manson Construction  
PO Box 24067  
Seattle, WA 98124

ATTN : Shawn Hillis

Work ID : PCB in oil  
Taken By : Client  
Transported by: Client  
Type : Oil in Transformers/Circuit B

### Certificate of Analysis

Work Order# : 00-10-340

DATE RECEIVED : 10/12/00

DATE OF REPORT: 10/27/00

#### SAMPLE IDENTIFICATION:

	<u>Sample Description</u>		<u>Sample Description</u>
01	#17 76A431368	02	#18 can't read

#### COMMENTS FOR PCB OIL ANALYSIS:

Due to the matrix, the retention time for tetrachloro-m-xylene shifted slightly.  
TCMX was manually assigned for the blank, blank spike and both samples.

#### FLAGGING:

The flag "U" indicates the analyte of interest was not detected, to the limit of detection indicated.

#### ATTACHMENTS:

Following presentation of sample results, the following appendices are attached to this report:

Appendix A: Method Blank Report

Appendix B: Blank Spike Recovery Report



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Chemistry, Microbiology, and Technical Services

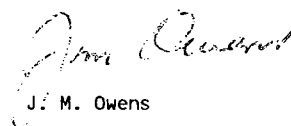
CLIENT : Manson Construction

## Certificate of Analysis

Work Order# : 00-10-340

Unless otherwise instructed all samples will be discarded on 12/10/00  
with the exception of samples which are consumed during the  
analysis, such as microbiological samples.

Respectfully submitted,  
Laucks Testing Laboratories, Inc.

  
J. M. Owens



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CLIENT : Manson Construction

### Certificate of Analysis

Work Order # 00-10-340

#### TESTS PERFORMED AND RESULTS:

Analyte	Units	<u>01</u>	<u>02</u>
PCBs	mg/kg	1.0 U	1.0 U



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Chemistry, Microbiology, and Technical Services

## Appendix A

### Method Blank Report



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### Quality Control Report Method Blanks for Work Order 0010340

Blank Name	Samples Verified	Test Description	Result	Units	Control	
					Limit	
B101600_GPX_M01	1-2	Total PCBs in Material	2.0 U	mg/kg AR	4.0	

A method blank can validate more than one analyte on more than one work order. The method blanks in this report may validate analytes not determined on this work order, but nonetheless determined in the associated blank.

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\* = blank exceeds control limit



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## Appendix B

### Blank Spike Recovery Report



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Chemistry, Microbiology, and Technical Services

Quality Control Report  
Blank Spike Report for Work Order 0010340

Blank Spike Names		Fractions Verified	Analyte Name	Recov	LCL	UCL
Database	Lab Assigned					
S101600_GPXM01	S101600GPXOL	1-2	Aroclor 1242	62	20	160

\* = Value Exceeds Control Limit

LCL = Lower Control Limit

UCL = Upper Control Limit

A blank spike can validate the results for more than one work order. For this reason, results for analytes not requested on this work order may appear in this blank spike report.



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Analytical ChemTech International, Inc.  
4011 Power Inn Road, Sacramento, CA 95826

PHONE 916•455•2284  
FAX 916•455•0191  
24 HR. PGR 916•328•5512  
WEB actiinc.com

## Polychlorinated Biphenyls (PCBs) Report EPA Method 8082

ASSET POWER SYSTEMS SERVICES  
25329 74TH AVE.  
SE, KENT, WA 98032  
ATTN: CRAIG DICKENS

Account: ASET  
PCB Report #: 81708  
Date Received: 13-Jul-00  
Date Reported: 14-Jul-00  
P.O. Number: 10577  
Project ID:  
Lab Contact: Jawied Anwar

Sample Identification	Serial Number	Lab Control #	Date Analyzed	Matrix	Results (PPM)	PCB Aroclor	Rpt.Lim. (PPM)
MANSON	703891	594039	14-Jul-00	OIL	<1	ND	1.0
MANSON	2297058	594040	14-Jul-00	OIL	6.2	1260	1.0
MANSON	2297057	594041	14-Jul-00	OIL	7.7	1254-60	1.0
MANSON	4680071	594042	14-Jul-00	OIL	1.6	1260	1.0
MANSON	703889	594043	14-Jul-00	OIL	<1	ND	1.0
MANSON	703890	594044	14-Jul-00	OIL	<1	ND	1.0

Units: Oils reporting units (mg/Kg). Solids dry wt. reporting units (mg/Kg).

Wipe reporting units in micrograms (ug)

Quality Control documentation available upon request.

CA DOHS ELAP Accreditation/Certificate Number 2130

The analyses, opinions or interpretations contained in this report are based upon material and information supplied by the client. Analytical ChemTech International, Inc. (ACTI) does not imply that the contents of the sample received by this laboratory are the same as all such material in the environment from which the sample was taken. Our test results relate only to the sample or sample tested. Any interpretation or opinion expressed represents the best judgment of ACTI. ACTI assumes no responsibility and makes no warranty or representation, expressed or implied, as to the continued existence, or proper operation of any equipment or other property for which this report may be used or relied upon for any reason whatsoever.

  
QC Chemist: JA - AB



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WEB actiinc.com

ASET POWER SYSTEMS SERVICES  
25329 74TH AVE.  
S., KENT, WA 98032  
ATTN: CRAIG DICKENS

Location: MANSON  
Serial #: 703891  
Bank/Ph:  
Tank: MAIN  
Fluid: MIN  
Breathing: SEAL

Mfr: MOLONEY  
KV: 13.2  
KVA:  
Container: C795  
Project ID.: 10577

Account: ASET  
Report #: 500830  
Control #: 594039  
Received: 13-Jul-00  
Reported: 14-Jul-00  
E-Reported: 14-Jul-00

P.O. #: 10577

Dissolved Gas Analysis	ASTM D-3612	Lab Control Number:	594039
	Report Units: PPM	Date Sampled:	11-Jul-00
		ACTI Report Number:	500830
		Oil Temp (C):	20
		Hydrogen (H2):	29
		Methane (CH4):	6
		Ethane (C2H6):	11
		Ethylene (C2H4):	6
		Acetylene (C2H2):	0
		Carbon Monoxide (CO):	75
		Carbon Dioxide (CO2):	1052
		Nitrogen (N2):	36000
		Oxygen (O2):	12231
		Total Gas:	49410
Oil Screen		Total Combustible Gas:	127
		Equivalent TCG Percent:	0.2499
	D-1533B	Moisture in Oil (ppm):	24
		% Saturation at Top Oil Temp:	44
	D-971	Interfacial Tension (dynes/cm):	11
	D-974	Acid Number (mg KOH/g):	978
	D-1500	Color Number (Relative):	L3.5
	D-1524	Visual Exam. (Relative):	CLR&SPRK
	D-1524	Sediment Exam. (Relative):	LIGHT
	D-877	Dielectric Breakdown (kV):	41
	D-1816	Dielectric Breakdown (kV mm-C):	
	D-924	Power Factor-25C (%):	
	D-924	Power Factor-100C (%):	
	D-1298	Specific Gravity (Relative):	.875
Diagnostics	DGA Key Gas / Interpretive Method: (Most recent sample)		Hydrogen within normal limits (500ppm). Methane within normal limits (100ppm). Ethane within normal limits (50ppm). Ethylene within normal limits (50ppm). Acetylene within normal limits (1ppm). Carbon Monoxide within normal limits (1000ppm). Carbon Dioxide within normal limits (10000ppm). Oxygen within normal limits (20000ppm).
	DGA Rogers Ratio Method:		Ratios not applicable - gases do not exceed limits.
	DGA Cellulose (paper) Insulation:		CO2/CO Ratio not applicable-neither gas exceeds its flag point.
	DGA IEEE/ANSI (C57.104-1991): (Two most recent samples)		
	Moisture in Oil:		Moisture content acceptable for continued use (35 max@<=69KV).
	Interfacial Tension:		IFT below limit, reclamation or disposal of oil recommended (25 min@<=69KV).
	Acid Number:		Acid number exceeds limit, reclamation or disposal of oil recommended (.20 max@<=69KV).
	Color Number, Visual, and Sediment:		Color number not acceptable, Visual acceptable, Sediment detected.
	Dielectric Breakdown:		D-877 value acceptable(26 min), D-1816 Not Analyzed.
	Power Factor:		Not Analyzed.

The analysis, equipment, or interpretation contained in this report are based upon material supplied by the client. Analytical ChemTech International, Inc. (ACTI) does not imply that the condition of the sample tested was the cause of, or affected, material in the environment from which the sample was taken. The test results relate only to the sample or samples tested. Any interpretation or opinion, expressed herein, is the best judgment of ACTI. ACTI assumes no responsibility and makes no warranty or representation, expressed or implied, as to the condition, performance, or proper operation of any equipment or other process for which this report may be used or relied upon for any reason whatsoever.



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24 HR. PGR 916•328•5512  
WEB actiinc.com

ASET POWER SYSTEMS SERVICES  
25329 74TH AVE.  
S. KENT, WA 98032  
ATTN: CRAIG DICKENS

Location: MANSON  
Serial #: 2297058  
Bank/Ph:  
Tank: MAIN  
Fluid: MIN  
Breathing: SEAL

Mfr: GE  
KV: 13.2  
KVA:  
Container: D964  
Project ID.: 10577

Account: ASET  
Report #: 500831  
Control #: 594040  
Received: 13-Jul-00  
Reported: 14-Jul-00  
E-Reported: 14-Jul-00

P.O. #: 10577

Dissolved Gas Analysis	ASTM D-3612	Lab Control Number:	594040
	Report Units: PPM	Date Sampled:	11-Jul-00
		ACTI Report Number:	500831
		Oil Temp (C):	20
		Hydrogen (H2):	133
		Methane (CH4):	5
		Ethane (C2H6):	31
		Ethylene (C2H4):	7
		Acetylene (C2H2):	0
		Carbon Monoxide (CO):	101
		Carbon Dioxide (CO2):	1313
		Nitrogen (N2):	40314
		Oxygen (O2):	11973
		Total Gas:	53877
Oil Screen		Total Combustible Gas:	277
		Equivalent TCG Percent:	0.6501
	D-1533B	Moisture in Oil (ppm):	45
		% Saturation at Top Oil Temp:	81
	D-971	Interfacial Tension (dynes/cm):	12
	D-974	Acid Number (mg KOH/g):	.296
	D-1500	Color Number (Relative):	G8.0
	D-1524	Visual Exam. (Relative):	CLR&SPRK
	D-1524	Sediment Exam. (Relative):	LIGHT
	D-877	Dielectric Breakdown (kV):	26
	D-1816	Dielectric Breakdown(kV mm-C):	
	D-924	Power Factor-25C (%):	
	D-924	Power Factor-100C (%):	
	D-1298	Specific Gravity (Relative):	.881
Diagnostics	DGA Key Gas / Interpretive Method: (Most recent sample)		Hydrogen within normal limits (500ppm). Methane within normal limits (100ppm). Ethane within normal limits (50ppm). Ethylene within normal limits (50ppm). Acetylene within normal limits (1ppm). Carbon Monoxide within normal limits (1000ppm). Carbon Dioxide within normal limits (10000ppm). Oxygen within normal limits (20000ppm).
	DGA Rogers Ratio Method:		Ratios not applicable - gases do not exceed limits.
	DGA Cellulose (paper) Insulation:		CO2/CO Ratio not applicable-neither gas exceeds its flag point.
	DGA IEEE/ANSI (C57.104-1991): (Two most recent samples)		
	Moisture in Oil:		Moisture content exceeds limit for continued use (35 max@<=69KV).
	Interfacial Tension:		IFT below limit, reclamation or disposal of oil recommended (25 min@<=69KV).
	Acid Number:		Acid number exceeds limit, minor reconditioning recommended (.20 max@<=69KV).
	Color Number, Visual, and Sediment:		Color number not acceptable, Visual acceptable, Sediment detected.
	Dielectric Breakdown:		D-877 value acceptable(26 min), D-1816 Not Analyzed.
	Power Factor:		Not Analyzed.

\* KV Class is 13.2 KV.

The analysis, opinions, or interpretations contained in this report are based upon material supplied by the client. Analytical ChemTech International, Inc. (ACTI) does not imply that the contents of the sample reflect the condition of all its material in the environment from which the sample was taken. Our results relate only to the sample or samples tested, and interpretation or opinion expressed represents the best information available. ACTI assumes no responsibility and makes no warranty or representation, expressed or implied, as to the condition, performance, or proper operation of, or a representation of, the equipment for which this analysis was conducted or relied upon for any reason whatsoever.





Analytical ChemTech International, Inc.  
4011 Power Inn Road, Sacramento, CA 95826

PHONE 916•455•2284  
FAX 916•455•0191  
24 HR. PGR 916•328•5512  
WEB actiinc.com

ASET POWER SYSTEMS SERVICES  
25329 74TH AVE.  
S., KENT, WA 98032  
ATTN: CRAIG DICKENS

Location: MANSON  
Serial #: 2297057  
Bank/Ph:  
Tank: MAIN  
Fluid: MIN  
Breathing: SEAL

Mfr: GE  
KV: 13.2  
KVA:  
Container: F301  
Project ID.: 10577

Account: ASET  
Report #: 500832  
Control #: 594041  
Received: 13-Jul-00  
Reported: 14-Jul-00  
E-Reported: 14-Jul-00

P.O. #: 10577

Dissolved Gas Analysis	ASTM D-3612	Lab Control Number:	594041
	Report Units: PPM	Date Sampled:	11-Jul-00
		ACTI Report Number:	500832
		Oil Temp (C):	20
		Hydrogen (H2):	0
		Methane (CH4):	2
		Ethane (C2H6):	0
		Ethylene (C2H4):	0
		Acetylene (C2H2):	0
		Carbon Monoxide (CO):	13
		Carbon Dioxide (CO2):	380
		Nitrogen (N2):	37590
		Oxygen (O2):	12798
		Total Gas:	50783
Oil Screen		Total Combustible Gas:	15
		Equivalent TCG Percent:	0.0222
	D-1533B	Moisture in Oil (ppm):	27
		% Saturation at Top Oil Temp:	52
	D-971	Interfacial Tension (dynes/cm):	18
	D-974	Acid Number (mg KOH/g):	.073
	D-1500	Color Number (Relative):	L4.0
	D-1524	Visual Exam. (Relative):	CLR&SPRK
	D-1524	Sediment Exam. (Relative):	ND
	D-877	Dielectric Breakdown (kV):	41
Diagnostics		D-1816	Dielectric Breakdown(kV mm-C):
		D-924	Power Factor-25C (%):
		D-924	Power Factor-100C (%):
		D-1298	Specific Gravity (Relative): .882
	DGA Key Gas / Interpretive Method:	(Most recent sample)	
		Hydrogen within normal limits (500ppm).	
		Methane within normal limits (100ppm).	
		Ethane within normal limits (50ppm).	
		Ethylene within normal limits (50ppm).	
		Acetylene within normal limits (1ppm).	
		Carbon Monoxide within normal limits (1000ppm).	
		Carbon Dioxide within normal limits (10000ppm).	
		Oxygen within normal limits (20000ppm).	
	DGA Rogers Ratio Method:	Ratios not applicable - gases do not exceed limits.	
	DGA Cellulose (paper) Insulation:	CO2/CO Ratio not applicable-neither gas exceeds its flag point.	
	DGA IEEE/ANSI (C57.104-1991):	(Two most recent samples)	
		Moisture in Oil:	
		Interfacial Tension:	
		Acid Number:	
	Color Number, Visual, and Sediment:	Color number not acceptable, Visual acceptable, Sediment not detected.	
	Dielectric Breakdown:	D-877 value acceptable(26 min), D-1816 Not Analyzed.	
	* KV Class is 13.2 kV.	Power Factor:	Not Analyzed.

The analysis, comments, or interpretations contained in this report are based upon materials supplied by the client. Analytical ChemTech International, Inc. (ACTI) does not imply that the contents of the sample tested are the same as all such material in the environment from which the sample was taken. Our test results relate only to the sample or sample tested. Any interpretation or opinion expressed represents the best assessment of ACTI. ACTI cannot take responsibility and makes no warranty or representation, expressed or implied, as to the condition, performance or proper operation of any equipment or other property for which this report may be used or relied upon for any reason whatsoever.



PHONE 916•455•2284  
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24 HR. PGR 916•328•5512  
WEB [actiinc.com](http://actiinc.com)

Account: ASET  
Report #: 500833  
Control #: 594042  
Received: 13-Jul-00  
Reported: 14-Jul-00  
E-Reported: 14-Jul-00

P.O. #: 10577

Breathing: SEAL

Dissolved Gas Analysis	ASTM D-3612	Lab Control Number:	594042	
	Report Units: PPM	Date Sampled:	11-Jul-00	
		ACTI Report Number:	500833	
		Oil Temp (C):	20	
		Hydrogen (H2):	0	
		Methane (CH4):	2	
		Ethane (C2H6):	4	
		Ethylene (C2H4):	3	
		Acetylene (C2H2):	0	
		Carbon Monoxide (CO):	24	
		Carbon Dioxide (CO2):	487	
		Nitrogen (N2):	30963	
		Oxygen (O2):	11683	
	Total Gas:	43166		
	Total Combustible Gas:	33		
	Equivalent TCG Percent:	0.0488		
Oil Screen	D-1533B	Moisture in Oil (ppm):	16	
		% Saturation at Top Oil Temp:	30	
	D-971	Interfacial Tension (dynes/cm):	20	
	D-974	Acid Number (mg KOH/g):	.061	
	D-1500	Color Number (Relative):	L2.5	
	D-1524	Visual Exam. (Relative):	CLR&SPRK	
	D-1524	Sediment Exam. (Relative):	ND	
	D-877	Dielectric Breakdown (kV):	38	
	D-1816	Dielectric Breakdown(kV mm-C):		
	D-924	Power Factor-25C (%):		
D-924	Power Factor-100C (%):			
D-1298	Specific Gravity (Relative):	.884		
Diagnostics	DGA Key Gas / Interpretive Method: (Most recent sample)		Hydrogen within normal limits (500ppm). Methane within normal limits (100ppm). Ethane within normal limits (50ppm). Ethylene within normal limits (50ppm). Acetylene within normal limits (1ppm). Carbon Monoxide within normal limits (1000ppm). Carbon Dioxide within normal limits (10000ppm). Oxygen within normal limits (20000ppm).	
	DGA Rogers Ratio Method:		Ratios not applicable - gases do not exceed limits.	
	DGA Cellulose (paper) Insulation:		CO2/CO Ratio not applicable-neither gas exceeds its flag point.	
	DGA IEEE/ANSI (C57.104-1991): (Two most recent samples)			
	Moisture in Oil:		Moisture content acceptable for continued use (35 max@<=69KV).	
	Interfacial Tension:		IFT below limit, minor reconditioning recommended (25 min@<=69KV).	
	Acid Number:		Acid number acceptable for continued use (.20 max@<=69KV).	
Color Number, Visual, and Sediment:			Color number not acceptable, Visual acceptable, Sediment not detected.	
Dielectric Breakdown:			D-877 value acceptable(26 min). D-1816 Not Analyzed.	
* KV Class is 13.2 kV.			Power Factor:	Not Analyzed.

As a consequence, a sample is taken from the population of all the samples that could be generated by the client. Analysis of all these is intractable. Thus, a MCMC-based method that the number of samples is fixed by the size of all samples is intractable in the context of this problem, since the sample size grows exponentially with the number of samples tested. Any interpretation of a sample's status as correct or incorrect is the best interpretation of MCMC. If it is assumed to be possible, and made no warranty or representation, expressed or implied, as to the condition, quality, or performance of any computer or other product for which the report may be used or relied upon by any person who uses it.

*[Signature]*



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ASET POWER SYSTEMS SERVICES  
25329 74TH AVE.  
S., KENT, WA 98032  
ATTN: CRAIG DICKENS

Location: MANSON  
Serial #: 703889  
Bank/Ph:  
Tank: MAIN  
Fluid: MIN  
Breathing: SEAL

Mfr: MOLONEY  
KV: 13.2  
KVA:  
Container: I213  
Project ID.: 10577

Account: ASET  
Report #: 500834  
Control #: 594043  
Received: 13-Jul-00  
Reported: 14-Jul-00  
E-Reported: 14-Jul-00

P.O. #: 10577

Dissolved Gas Analysis	ASTM D-3612	Lab Control Number:	594043
	Report Units: PPM	Date Sampled:	11-Jul-00
		ACTI Report Number:	500834
		Oil Temp (C):	20
		Hydrogen (H2):	21
		Methane (CH4):	9
		Ethane (C2H6):	20
		Ethylene (C2H4):	13
		Acetylene (C2H2):	0
		Carbon Monoxide (CO):	81
		Carbon Dioxide (CO2):	675
		Nitrogen (N2):	39345
		Oxygen (O2):	13646
		Total Gas:	54110
		Total Combustible Gas:	144
		Equivalent TCG Percent:	0.2107
Oil Screen	D-1533B	Moisture in Oil (ppm):	17
		% Saturation at Top Oil Temp:	31
	D-971	Interfacial Tension (dynes/cm):	15
	D-974	Acid Number (mg KOH/g):	.161
	D-1500	Color Number (Relative):	L3.5
	D-1524	Visual Exam. (Relative):	CLR&SPRK
	D-1524	Sediment Exam. (Relative):	ND
	D-877	Dielectric Breakdown (kV):	45
	D-1816	Dielectric Breakdown(kV mm-C):	
	D-924	Power Factor-25C (%):	
Diagnostics	D-924	Power Factor-100C (%):	
	D-1298	Specific Gravity (Relative):	.889
	DGA Key Gas / Interpretive Method:	(Most recent sample)	
		Hydrogen within normal limits (500ppm).	
		Methane within normal limits (100ppm).	
		Ethane within normal limits (50ppm).	
		Ethylene within normal limits (50ppm).	
		Acetylene within normal limits (1ppm).	
		Carbon Monoxide within normal limits (1000ppm).	
		Carbon Dioxide within normal limits (10000ppm).	
		Oxygen within normal limits (20000ppm).	
	DGA Rogers Ratio Method:	Ratios not applicable - gases do not exceed limits.	
	DGA Cellulose (paper) Insulation:	CO2/CO Ratio not applicable-neither gas exceeds its flag point.	
	DGA IEEE/ANSI (C57.104-1991):	(Two most recent samples)	
	Moisture in Oil:	Moisture content acceptable for continued use (35 max@<=69KV).	
	Interfacial Tension:	IFT below limit, reclamation or disposal of oil recommended (25 min@<=69KV).	
	Acid Number:	Acid number acceptable for continued use ( 20 max@<=69KV).	
	Color Number, Visual, and Sediment:	Color number not acceptable, Visual acceptable, Sediment not detected.	
	Dielectric Breakdown:	D-877 value acceptable(26 min), D-1816 Not Analyzed.	
	* KV Class is 13.2 KV.	Power Factor:	Not Analyzed.

The analysis, opinion, or interpretation contained in this report has been developed solely by the client. Analytical ChemTech International, Inc. (ACTI) does not imply that the contents of this sample reflect the state of affairs in the environment from which the sample was taken. Our test results relate only to the sample or samples tested. Any interpretation, or opinion, or report, or data, or judgment of ACTI is based on the responsibility, and makes no warranty or representation, expressed or implied, as to the condition, performance, proper operation of any equipment or other property for which this report may be used or relied upon for any use or whatsoever.



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WEB actiinc.com

ASET POWER SYSTEMS SERVICES  
25329 74TH AVE.  
S., KENT, WA 98032  
ATTN: CRAIG DICKENS

Location: MANSON  
Serial #: 703890  
Bank/Ph:  
Tank: MAIN  
Fluid: MIN  
Breathing: SEAL

Mfr: MOLONEY  
KV: 13.2  
KVA:  
Container: F988  
Project ID.: 10577

Account: ASET  
Report #: 500835  
Control #: 594044  
Received: 13-Jul-00  
Reported: 14-Jul-00  
E-Reported: 14-Jul-00

P.O. #: 10577

Dissolved Gas Analysis	ASTM D-3612	Lab Control Number:	594044
	Report Units: PPM	Date Sampled:	11-Jul-00
		ACTI Report Number:	500835
		Oil Temp (C):	20
		Hydrogen (H2):	262
		Methane (CH4):	9
		Ethane (C2H6):	44
		Ethylene (C2H4):	8
		Acetylene (C2H2):	0
		Carbon Monoxide (CO):	118
		Carbon Dioxide (CO2):	1557
		Nitrogen (N2):	37240
		Oxygen (O2):	11937
		Total Gas:	51175
		Total Combustible Gas:	441
		Equivalent TCG Percent:	1.2271
Oil Screen	D-1533B	Moisture in Oil (ppm):	30
		% Saturation at Top Oil Temp:	56
	D-971	Interfacial Tension (dynes/cm):	12
	D-974	Acid Number (mg KOH/g):	550
	D-1500	Color Number (Relative):	L3.0
	D-1524	Visual Exam. (Relative):	CLR&SPRK
	D-1524	Sediment Exam. (Relative):	TRACE
	D-877	Dielectric Breakdown (kV):	33
	D-1816	Dielectric Breakdown(kV mm-C):	
	D-924	Power Factor-25C (%):	
Diagnostics	D-924	Power Factor-100C (%):	
	D-1298	Specific Gravity (Relative):	.873
	DGA Key Gas / Interpretive Method:	(Most recent sample)	Hydrogen within normal limits (500ppm). Methane within normal limits (100ppm). Ethane within normal limits (50ppm). Ethylene within normal limits (50ppm). Acetylene within normal limits (1ppm). Carbon Monoxide within normal limits (1000ppm). Carbon Dioxide within normal limits (10000ppm). Oxygen within normal limits (20000ppm).
	DGA Rogers Ratio Method:		Ratios not applicable - gases do not exceed limits.
	DGA Cellulose (paper) Insulation:		CO2/CO Ratio not applicable-neither gas exceeds its flag point.
	DGA IEEE/ANSI (C57.104-1991):		
	(Two most recent samples)		
	Moisture in Oil:		Moisture content acceptable for continued use (35 max@<=69KV).
	Interfacial Tension:		IFT below limit, reclamation or disposal of oil recommended (25 min@<=69KV).
	Acid Number:		Acid number exceeds limit, reclamation or disposal of oil recommended (.20 max@<=69KV).
	Color Number, Visual, and Sediment:		Color number not acceptable, Visual acceptable, Sediment detected.
	Dielectric Breakdown:		D-877 value acceptable(26 min), D-1816 Not Analyzed.
	* KV Class is 13.2 KV.	Power Factor:	Not Analyzed.

The analysis, responses, or interpretation contained in this report are for oil upon material supplied by the client. Analytical ChemTech International, Inc. (ACTI) does not imply that the contents of the sample tested are the same as all such material in the environment from which the sample was taken. Your test results relate only to the sample or samples tested. Any interpretation or opinion expressed is presented as the best judgment of ACTI. ACTI assumes no responsibility and makes no warranty or representation, expressed or implied, as to the condition, performance, proper operation, or any component or other property for which this report might be used or relied upon for any reason whatsoever.

## OIL RE-REFINING CO., INC.

No. 88057

51 Bozarth  
P.O. Box 1407  
Woodland, WA 98674  
EPA # WAD 980986012

**24 Hour Emergency**  
**(503) 286-8352**  
**1-800-367-8894**

Cust. I.D. \_\_\_\_\_  
Call Back \_\_\_\_\_

<b>Generator</b>						<b>Billing Address</b>		
Name: <u>James L. Smith</u>								
Contact: <u>Tony</u>								
Date: <u>10-20-00</u>								
Address: <u>5209 E. Marginal Way South Apt 98124 (206) 742-0850</u>								
City: _____ State: _____ Zip: _____ Phone: _____								
Consigned To: <u>Fuel Processors 0209809-75652</u>						Profile Date: <u>10-20-00</u>		
Destination: <u>4150 N. Seattle Rd Port Bl Co 97217</u>						CK# _____ P.O.# _____		
Via Carrier: <u>oil tanker</u>						Load Ticket # _____		
Driver: <u>Pete</u> Truck No.: <u>8037</u> Miles Run: _____								
Gallons	Description	Weight	Rate Per Gallon	Rate Per Hour	Charge Paid			
<u>1000</u>	<u>Transfer misc oil 1000 lbs 2 ppm PCB's</u>							
<u>110</u>	<u>Transfer misc oil more than 2 ppm PCB's</u>							
	<u>As found PCB's</u>							
	* Transported for recycling							
	Total							
Customer warrants that the waste petroleum products being transferred by the above collector do not contain any contaminants including, without limitation, pesticides, chlorinated solvents at concentrations greater than 1000 PPM, PCB's at greater concentrations greater than 2 PPM (or 50 PPM with Manifest), or any other material classified as hazardous waste by 40 CFR part 261, Subparts C and D (implementing the Federal Resource Conservation and Recovery Act) or by any equivalent State hazardous waste or hazardous substance classification program. Should laboratory tests find this waste product not in compliance with 40 CFR Part 261, customer (generator) agrees to pay for all disposal costs incurred.								
S	IX	<u>Sho Hillis</u>	Date	<u>10/20/00</u>				

Generator Name Marson Corst Location 5209 E Marginal wdy South  
Seattle WA 98124

**Generator Fills Out Waste/Material Profile (One completed profile per product)**

Description: Used Automotive Oil ☐ DIY Used Oil ☐ Machine Lubricating Oil ☐ Machine Tool Cutting and/or Cooling Fluids  
(including used solutions) containing at least 1% petroleum ☐ Hydraulic Oil ☐ Brake Fluid ☐ Refrigeration Oil ☐ Fuel Filters ☐  
Oil Filters ☐ Antifreeze ☐ Oil Used as a Non-Contact Heat Transfer Media ☐ Solvent ☐

Unused Fuels and Type: Description (where and how generated) \_\_\_\_\_

Water/Petroleum Mixtures: Type \_\_\_\_\_

Percent Water 1 % Actual Calculation ☐ Process Knowledge ☒ Clear Tube ☐ Kolor Kut ☐

Transformer Oil PCB under 2PPM ☒ PCBs under 50PPM ☒ Date tested 8-10-00 Tests attached ☒

Generator hereby certifies that no dilution of oil containing PCBs has occurred below any regulatory threshold:

Signed: \_\_\_\_\_

Oily Solids: Tank Sludge ☐ Sump Sludge ☐ Contaminated Soil ☐ Spill Cleanup Material ☐

Other (Specify): \_\_\_\_\_ Attach all pertinent documents

Solvent: Flash Point \_\_\_\_\_

Has generator mixed solvent with any hazardous waste? Yes ☐ No ☐ If yes, Stop Call Supervisor

For all wastes or materials, provide the following information: Field Data

Sniffer Test Passed ☐ Failed ☐ Date Tested \_\_\_\_\_ Clor-D-Test Test Results \_\_\_\_\_ PPM Date Tested \_\_\_\_\_ PH \_\_\_\_\_

Is Material Mixed With Hazardous Waste? Yes ☐ No ☒ If yes, Stop call Supervisor

Corrosive? Yes ☐ No ☒ Reactive? Yes ☐ No ☒ Toxic? Yes ☐ No ☒ Listed? Yes ☐ No ☒ Flash Over 140°F Yes ☒ No ☐

List All Pertinent Information (Describe process of waste generation in detail) Attach all Documentation

including all MSDS sheets & test results; Transformer oil with PCB content  
pumped out from old transformers

Analytical Attached

Name and Title of Person providing information: SHAWN Hillis EP MGR

Facility E.P.A. REG # 440 007942824 HW Generator Status: LQG ☒ SQG ☐ CEG ☐

**Certification & Guarantee**

As generator of the material described in this profile (or authorized representative of the generator), I hereby certify that the information contained in this document is accurate and complete. I further certify that this material has NOT been mixed with any contaminants including, without limitations, Pesticides and waste listed or identified as hazardous waste under RCRA, or, if mixing has occurred, this material has been mixed with an ignitable-only hazardous waste in compliance with the used oil mixture rule, or C.E.G. exemption. In the event that the material described in this document is in fact hazardous waste, I hereby guarantee to pay all costs necessary for proper analysis, transportation, storage and disposal.

Signed Shawn Hillis Title EP MGR Date 10/20/00

**Receiving Facility Data**

Is Waste/Material Acceptable for Processing?: Yes ☐ No ☐ Explanation: \_\_\_\_\_

Accepted ☐ Signed \_\_\_\_\_ Title \_\_\_\_\_ Date \_\_\_\_\_

Rejected ☐ Reason \_\_\_\_\_

Returned to Generator? Yes ☐ No ☐ Transported To: \_\_\_\_\_

701 Bozarth  
P.O. Box 1407  
Woodland, WA 98674  
EPA # WAD 980986012

# OIL RE-REFINING CO., INC.

24 Hour Emergency  
(503) 286-8352  
1-800-367-8894

No. 87455

Cust. I.D. 6115  
Call Back \_\_\_\_\_

Generator <u>Manson Construction</u> Date <u>7-26-00</u>		Billing Address			
Name <u>5209 E. Marginal Way Seattle</u> Contact <u>206-762</u>					
Address <u>WA</u> State <u>98134</u> Zip <u>0850</u> Phone					
Consigned To: <u>ORRCO</u>		Profile Date:			
Destination: <u>Portland Or.</u>		CK# P.O.#			
Via Carrier: <u>ORRCO</u>		Load Ticket # <u>997080</u>			
Driver: <u>Mark</u> Truck No.: <u>2326</u> Miles Run:					
Gallons	Description	Weight	Rate Per Gallon	Rate Per Hour	Charge Paid
<u>1521</u>	<u>2 PPM T-Oil Taken At Harbor</u>				
<u>3100</u>	<u>50 PPM</u>				
<u>4621</u>	<u>Total Analytic Attached</u>				
	<u>+ customer profile</u>				
	* Transported for recycling				
	Total				
Customer warrants that the waste petroleum products being transferred by the above collector do not contain any contaminants including, without limitation, pesticides, chlorinated solvents at concentrations greater than 1000 PPM, PCB's at greater concentrations greater than 2 PPM (or 50 PPM with Manifest), or any other material classified as hazardous waste by 40 CFR part 261, Subparts C and D (implementing the Federal Resource Conservation and Recovery Act) or by any equivalent State hazardous waste or hazardous substance classification program. Should laboratory tests find this waste product not in compliance with 40 CFR Part 261, customer (generator) agrees to pay for all disposal costs incurred.					
Signed X <u>Shirley H. Davis</u>		Date <u>7-26-2000</u>			

OIL RE-REFINING COMPANY

PLEASE INCLUDE  
INVOICE # AND  
CUSTOMER ID #  
WITH PAYMENT

P.O. BOX 1407  
OODLAND, WA 98674  
PHONE 503-286-8352  
EPA #WAD980986012

\*\*\*\*\*  
\* I N V O I C E \*  
\*\*\*\*\*

Invoice Number: 139308

Invoice Date: 08/04/00

Page: 1

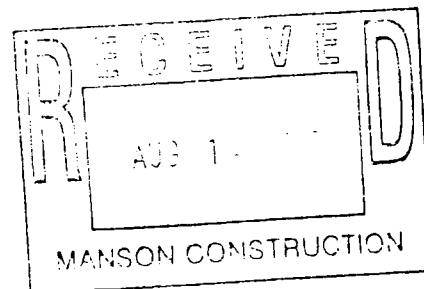
Sold Manson Construction  
To: PO Box 24067  
Seattle, WA  
98124

Ship Manson Construction  
To: 5209 E Marginal Way S  
Seattle, WA  
98134

Ship Via.: ORRCO  
Ship Date: 07/26/00  
Due Date: 08/14/00  
Terms.....: NET 10 DAYS

Cust I.D.....: 6115  
P.O. Number...:  
P.O. Date.....: 07/26/00  
Job/Order No.: 997080  
Salesperson...:

Item I.D./Desc.	Ordered	Shipped	Unit	Price	Net	TX
1 Mineral Oil	4621.00	4621.00	GAL.	0.2500	1155.25	E
1 Truck & Driver 10 hrs	10.00	10.00	HRS	65.0000	650.00	E



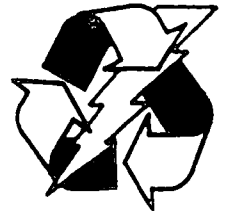
Call us for more information on Services we  
offer to help you in your recycling needs.  
RECYCLING TODAY, FOR A BETTER TOMORROW

Subtotal: 1805.25  
Tax.....: 0.00  
Payments: 0.00  
Total....: 1805.25

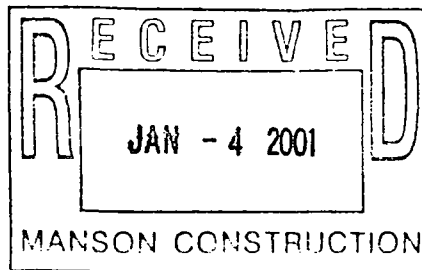


# Coleman/Calbag Utility Recovery

TRANSFORMER & SUBSTATION  
REMOVAL AND DISMANTLING



JANUARY 2, 2001



MR. RANDY THORSEN  
MANSON CONSTRUCTION CO.  
5209 EAST MARGINAL WAY SOUTH  
P.O. BOX 24067  
SEATTLE, WA 98124

DEAR MR. THORSEN:

ON OCTOBER 24, 2000 WE RECEIVED THE FOLLOWING ITEMS FROM MANSON CONSTRUCTION CO.:

UNIT#	SERIAL#	UNIT#	SERIAL#	UNIT#	SERIAL#
1	703892	4	5026575	7	229376
2	703893	5	UNKNOWN	8	109527B
3	703894	6	2305997	9	4222
10	76A220010				

WE FINISHED SCRAPPING THESE ITEMS ON OCTOBER 27, 2000. YOU CAN RETIRE THEM FROM YOUR INVENTORY.

ON NOVEMBER 2, 2000 WE RECEIVED THE FOLLOWING 2 ITEMS FROM MANSON CONSTRUCTION CO.:

UNIT#	SERIAL#	UNIT#	SERIAL#
17	76A431368	41	GEH1772

WE FINISHED SCRAPPING THESE ITEMS ON DECEMBER 1, 2000. YOU CAN RETIRE THEM FROM YOUR INVENTORY.

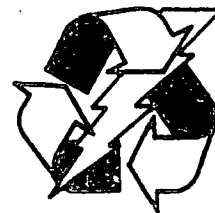
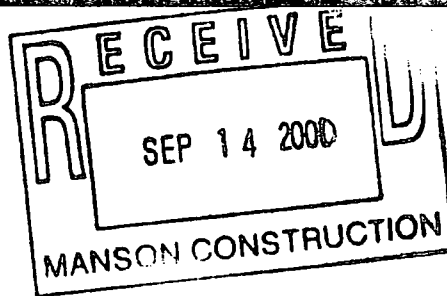
SINCERELY,

NANCY COLEMAN

t/h

# Coleman/Calbagg Utility Recovery

TRANSFORMER & SUBSTATION  
REMOVAL AND DISMANTLING



SEPTEMBER 11, 2000

SHAUN HILLIS  
MANSON CONSTRUCTION CO.  
5209 EAST MARGINAL WAY SOUTH  
SEATTLE, WASHINGTON 98134

DEAR MR. HILLIS:

WE RECEIVED THE FOLLOWING TRANSFORMERS FROM MANSON CONSTRUCTION COMPANY ON  
JULY 28, 2000, BILL OF LADING #207872 AND #208248.

NUMBER	SERIAL #	NUMBER	SERIAL #	NUMBER	SERIAL #
11	703891	13	703890	15	2297057
12	703889	14	2297058	16	4680071

WE FINISHED SCRAPPING THESE ITEMS ON AUGUST 2, 2000. YOU CAN RETIRE THEM  
FROM YOUR INVENTORY.

SINCERELY,

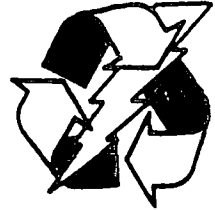
*Nancy Coleman*

NANCY COLEMAN

t/h

# Coleman/Calbag Utility Recovery

TR TRANSFORMER & SUBSTATION  
RE MOVAL AND DISMANTLING



DECEMBER 27, 2001

MANSON CONSTRUCTION  
5209 E MARGINAL WAY S.  
SEATTLE, WA 98124

RON SEARS DELIVERED THE FOLLOWING ITEMS ON DECEMBER 27, 2001.

## SERIAL NUMBER

8922679  
9063623  
9486795  
9029520

RECEIVED BY COLEMAN CALBAG UTILITY RECOVERY

NANCY COLEMAN

DECEMBER 27, 2001

*Nancy  
Coleman*